

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.:** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**DILENIA GERMOSEN** : **VIOLATIONS:**  
18 U.S. C. § 1956(a)(3)(laundering  
monetary instruments - 9 counts)  
18 U.S.C. § 2 (aiding and abetting)

**INDICTMENT**

**COUNTS ONE THROUGH NINE**

**THE GRAND JURY CHARGES THAT:**

At all relevant times to this indictment:

1. Defendant DILENIA GERMOSEN was the manager and operator of GERMOSEN COMMUNICATIONS, INC. ("GCI"), located at 325 E. Wyoming Avenue, Philadelphia, Pennsylvania. GCI was a money remitting service, offering domestic and international money transmitting, bill paying service, prepaid telephone cards and international telephone calling to the public.

2. Defendant DILENIA GERMOSEN was a licensed money transmitter for BHD Corporation, Sigue Corporation, Pronto Envios-Envios RD Corporation, AmeraCash Solutions, Incorporated and Girosal Corporation, in the State of Pennsylvania. BHD Corporation, Sigue Corporation, Pronto Envios-Envios RD Corporation, AmeraCash Solutions, Incorporated and Girosal Corporation are money service businesses with more than 5,000 money transfer and sales locations throughout the United States. As money service businesses, they are required to comply with the anti-money laundering and currency reporting requirements of the Bank

Secrecy Act, 31 U.S.C. § 5311 et. seq.

3. BHD Corporation, Sigue Corporation, Pronto Envios-Envios RD Corporation, AmeraCash Solutions, Incorporated and Girosal Corporation provide training to each of their agents on the money laundering laws and currency reporting requirements. These companies provide manuals and updates to all of their agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

4. Defendant DILENIA GERMOSEN received training manuals and other documentation and information from BHD Corporation, Sigue Corporation, Pronto Envios-Envios RD Corporation, AmeraCash Solutions, Incorporated and Girosal Corporation regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transactions reporting requirements of the Bank Secrecy Act. Defendant GERMOSEN is the compliance officer for GCI and retained these training manuals and other documents and information on the premises of GCI.

5. Defendant DILENIA GERMOSEN conducted financial transactions which were represented to her by two cooperating witnesses (CWs), working at the direction of federal officials, to be the proceeds of illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendant GERMOSEN arranged for international transfers of money to the Dominican Republic and exchanged small denominations of United States currency (\$10s/\$20s) for larger denominations of United States currency (\$100s). Defendant GERMOSEN structured the transactions to evade and defeat the currency transaction reporting requirements and permitted the use of false identification and

fictitious names to prevent discovery of the sender's true identity and to evade the reporting requirements.

6. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DILENIA GERMOSEN**

knowingly conducted and aided and abetted the following financial transactions affecting interstate and foreign commerce:

| COUNT | DATE     | AMOUNT LAUNDERED   | FEES PAID |
|-------|----------|--|-----------|
| 1     | 4-21-05  | \$2,700 wired (split into 2 separate wire transfers) to the Dominican Republic   | \$400     |
| 2     | 5-12-05  | \$1,500 wired to the Dominican Republic  | \$250     |
| 3     | 5-31-05  | \$1,500 wired to the Dominican Republic  | \$250     |
| 4     | 8-02-05  | \$1,500 wired to the Dominican Republic  | \$250     |
| 5     | 8-11-05  | \$1,000 wired to the Dominican Republic  | \$200     |
| 6     | 9-15-05  | \$2,500 wired (split into 2 separate wire transfers) to the Dominican Republic   | \$400     |
| 7     | 10-15-05 | \$2,000 (small denomination bills) exchanged for \$100 bills   | \$300     |
| 8     | 2-23-06  | \$1,000 wired to the Dominican Republic<br>\$2,000 (small denomination bills) exchanged for \$100 bills  | \$350     |
| 9     | 7-18-06  | \$2,000 wired (split into 2 separate wire transfers) to the Dominican Republic<br>\$4,000 (small denomination bills) exchanged for \$100 bills | \$600     |

7. When conducting the financial transactions described in paragraph 6 above, defendant DILENIA GERMOSEN acted with the intent to conceal and disguise the nature, location, source, ownership and control of what she believed were the proceeds of the specified

unlawful activity, and with the intent to promote the carrying on of such specified unlawful activity.

All in violations of Title 18, United States Code, Sections 1956(a)(3) and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**